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April 20, 2015

VIA ECF AND FEDEX

Hon. Joseph A. Dickson, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: Jazz Pharmaceuticals, Inc. v. Amneal Pharmaceuticals, LLC, et al.
Civil Action Nos. 13-391, 14-3235, & 15-1043 (ES)(JAD)

Jazz Pharmaceuticals, Inc. v. Par Pharmaceutical, Inc.
Civil Action Nos. 14-5139, 14-6150, & 15-173 (ES)(JAD)

Jazz Pharmaceuticals, Inc. v. Ranbaxy Laboratories Limited, et al.
Civil Action Nos. 14-4467, 14-6151, & 15-187 (ES)(JAD)

Jazz Pharmaceuticals, Inc. v. Watson Laboratories, Inc.
Civil Action No. 14-7757 (ES)(JAD)

Dear Judge Dickson:

This firm, together with Quinn Emanuel Urquhart & Sullivan, LLP and Richard G. Greco PC, represents plaintiff Jazz Pharmaceuticals, Inc. ("Jazz") in the above-referenced matters.

Enclosed for Your Honor's consideration is a stipulation and proposed order, to which the parties have agreed, which, subject to Your Honor's approval, would consolidate these cases. If the stipulation and proposed order meet with Your Honor's approval, we respectfully request that Your Honor sign and have it entered on the docket to formally effect consolidation and to reset the case schedule.

Thank you for Your Honor's kind attention to this matter.

Hon. Joseph A. Dickson, U.S.M.J.

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Respectfully yours,



William C. Baton

Enclosure

cc: Hon. Esther Salas, U.S.D.J.
All Counsel (via e-mail)

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JAZZ PHARMACEUTICALS, INC.,

Plaintiff,

v.

**AMNEAL PHARMACEUTICALS, LLC
and PAR PHARMACEUTICAL, INC.,**

Defendants.

Civil Action No. 13-391 (ES)(JAD)

JAZZ PHARMACEUTICALS, INC.,

Plaintiff,

v.

**AMNEAL PHARMACEUTICALS,
LLC,**

Defendant.

Civil Action No. 14-3235 (ES)(JAD)

**JAZZ PHARMACEUTICALS, INC. and
JAZZ PHARMACEUTICALS
IRELAND LIMITED,**

Plaintiffs,

v.

**AMNEAL PHARMACEUTICALS,
LLC,**

Defendant.

Civil Action No. 15-1043 (ES)(JAD)

JAZZ PHARMACEUTICALS, INC.,
Plaintiff,

v.

PAR PHARMACEUTICAL, INC.,
Defendant.

Civil Action No. 14-5139 (ES)(JAD)

JAZZ PHARMACEUTICALS, INC. and
JAZZ PHARMACEUTICALS
IRELAND LIMITED,

Plaintiffs,

v.

PAR PHARMACEUTICAL, INC.,
Defendant.

Civil Action No. 14-6150 (ES)(JAD)

JAZZ PHARMACEUTICALS, INC.,
Plaintiff,

v.

PAR PHARMACEUTICAL, INC.,
Defendant.

Civil Action No. 15-173 (ES)(JAD)

JAZZ PHARMACEUTICALS, INC.,

Plaintiff,

v.

**RANBAXY LABORATORIES
LIMITED AND RANBAXY INC.,**

Defendants.

Civil Action No. 14-4467 (ES)(JAD)

**JAZZ PHARMACEUTICALS, INC. and
JAZZ PHARMACEUTICALS
IRELAND LIMITED,**

Plaintiffs,

v.

**RANBAXY LABORATORIES
LIMITED AND RANBAXY INC.,**

Defendants.

Civil Action No. 14-6151 (ES)(JAD)

JAZZ PHARMACEUTICALS, INC.,

Plaintiff,

v.

**RANBAXY LABORATORIES
LIMITED AND RANBAXY INC.,**

Defendants.

Civil Action No. 15-187 (ES)(JAD)

**JAZZ PHARMACEUTICALS, INC. and
JAZZ PHARMACEUTICALS
IRELAND LIMITED,**

Plaintiffs,

v.

WATSON LABORATORIES, INC.,

Defendant.

Civil Action No. 14-7757 (ES)(JAD)

[PROPOSED] CONSOLIDATION STIPULATION AND ORDER

WHEREAS, Plaintiff Jazz Pharmaceuticals, Inc. (“Jazz”) initiated Civil Action Nos. 14-3235 (ES)(JAD) and 15-1043 (ES)(JAD), alleging infringement of United States Patent Nos. 8,589,182, 8,731,963, 8,772,306, and 8,859,619 by Defendant Amneal Pharmaceuticals, LLC’s (“Amneal”) submission of Abbreviated New Drug Application (“ANDA”) No. 203631 to the U.S. Food and Drug Administration for approval to market a 500 mg/ml sodium oxybate oral solution;

WHEREAS, Jazz initiated Civil Action Nos. 14-5139 (ES)(JAD), 14-6150 (ES)(JAD), and 15-173 (ES)(JAD) alleging infringement of United States Patent Nos. 8,731,963, 8,772,306, and 8,859,619 by Defendant Par Pharmaceutical, Inc.’s (“Par”) submission of ANDA No. 205403 to the U.S. Food and Drug Administration for approval to market a 500 mg/ml sodium oxybate oral solution;

WHEREAS, Jazz initiated Civil Action Nos. 14-4467 (ES)(JAD), 14-6151 (ES)(JAD), and 15-187 (ES)(JAD) alleging infringement of United States Patent Nos. 6,472,431, 6,780,889, 7,262,219, 7,851,506, 8,263,650, 8,324,275, 8,461,203, 7,668,730, 7,765,106, 7,765,107, 7,895,059, 8,457,988, 8,589,182, 8,731,963, 8,772,306, and

8,859,619 by Defendant Ranbaxy Laboratories Limited and Ranbaxy, Inc.'s ("Ranbaxy") submission of ANDA No. 203351 to the U.S. Food and Drug Administration for approval to market a 500 mg/ml sodium oxybate oral solution;

WHEREAS, Jazz initiated Civil Action No. 14-7757 (ES)(JAD), alleging infringement of United States Patent Nos. 6,472,431, 6,780,889, 7,262,219, 7,851,506, 8,263,650, 8,324,275, 8,461,203, 7,668,730, 7,765,106, 7,765,107, 7,895,059, 8,457,988, 8589,182, 8,731,963, and 8,772,306 by Defendant Watson Laboratories, Inc.'s ("Watson") submission of ANDA No. 204952 to the U.S. Food and Drug Administration for approval to market a 500 mg/ml sodium oxybate oral solution;

WHEREAS, these causes of action are substantially related to the litigation initiated by Jazz captioned *Jazz Pharmaceuticals, Inc. v. Amneal Pharmaceuticals, LLC and Par Pharmaceutical, Inc.*, Civil Action No. 13-391 (ES)(JAD), which is also before this Court and concerns United States Patent Nos. 6,472,431, 6,780,889, 7,262,219, 7,851,506, 8,263,650, 8,324,275, 8,461,203, 7,668,730, 7,765,106, 7,765,107, 7,895,059, 8,457,988, and 8,589,182;

WHEREAS, the parties have agreed to the consolidation of these actions;

WHEREAS, good cause exists to consolidate these actions with Civil Action No. 13-391;

WHEREFORE, Jazz, Amneal, Par, Ranbaxy and Watson, by their attorneys, respectfully request that this Court consolidate Civil Action Nos. 14-3235, 15-1043, 14-5139, 14-6150, 15-173, 14-4467, 14-6151, 15-187, 14-7757, with Civil Action No. 13-391 and that all of the papers be maintained in Civil Action No. 13-391.

Dated: April 20, 2015

Respectfully submitted,

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IT IS on this ____ day of _____, 2015

Hon. Joseph A. Dickson, U.S.M.J.

cc: Hon. Esther Salas, U.S.D.J.